

July 6, 2016

*Via Electronic And Certified U.S. Mail*

Amy Frank  
3411 North 16'th Street, Apt. 2040  
Phoenix, AZ 85016



CAMPBELL PERRY LLC

RE: Dr. Richard Carrier -- Defamatory Allegations

Dear Ms. Frank:

Please be advised that our office has been retained by Dr. Carrier concerning false and defamatory allegations in your recent posts on Facebook and elsewhere. You are hereby ordered to immediately **CEASE AND DESIST** making any further false and/or defamatory statements about Dr. Carrier.

It is unlawful to engage in defamation of another's character and reputation. Defamation consists of broadcast statements, that a speaker either knows to be false or makes with reckless disregard as to truth or falsity, that lower a person's esteem in the community or deter others from associating with him. Injury to reputation is presumed if the defamation concerns statements that a person is guilty of a crime involving moral turpitude, or about a person's business or profession. According to your online statements, you alleged very serious charges that include sexual harassment, sexual assault, sexual abuse, and corruption, to wit:

Parents, and younger people who may graciously volunteer for Camp Quest, a summer camp for kids.

Richard Carrier, the man who sexually harassed me and touched me a year ago [2015--ed.] after speaking at ASU [Arizona State University--ed.] is now an official employee of this organization. Campus Quest [sic--ed.] and the Secular Student Alliance are partners, and fully aware of what transpired last year. I'm not even close to being his only victim, and there are even more victims of other speakers of the SSA.

Want to know why he continues to be involved after being banned from being an SSA speaker? He is dating the wife of the Executive Director of the Secular Student Alliance.

Corrupt people continue to destroy what could be wonderful organizations. I am officially BOYCOTTING the national Secular Student Alliance until their leadership is completely dismantled. Students deserve to have an organization capable of handling sexual harassment and assault, with no conflicts of interest. Not only is abuse fairly common at SSA events, but the organization itself goes out of their way to undermine the reports of its very own members' trauma.

I've held my tongue far too long. No more sweeping this shit under the rug. Time to own the fuck up and face the music. The victims have had enough.

If you've been a victim of harassment or assault at any SSA-sponsored event, please feel free to contact me. I will keep your name confidential.

7240 Muirfield Drive, Suite 120  
Dublin, OH 43017

614-558-0125 Main  
614-668-8442 Direct  
614-675-2210 Fax  
[jeff@campbellperrylaw.com](mailto:jeff@campbellperrylaw.com)

[www.campbellperrylaw.com](http://www.campbellperrylaw.com)

Plaintiff's  
Exhibit 9



Your account, published on Facebook and elsewhere, accused Dr. Carrier of crimes involving moral turpitude and lowered his professional reputation. Dr. Carrier vigorously disputes the entirety of your allegations. Your account is false, and is contradicted by both eyewitnesses, and an independent professional investigation.



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On information and belief, on or about April 3, 2015, Dr. Carrier was an invited speaker for an affiliate of the ASU Secular Student Alliance. As you're aware, Dr. Carrier has publicly revealed himself to be polyamorous. During an after party, at the home of Dr. Carrier's host, you initiated a discussion expressing your interest in an open marriage. You indicated, however, this was not a shared interest with your husband. You made clear your preference the discussion be kept in confidence, adding words to the effect that your husband reads all your private communications. Dr. Carrier remarked that he found you interesting and, before concluding the conversation, extended an open invitation to ask him out should your marital circumstances ever change. At no time whatsoever did Dr. Carrier make physical contact with you, nor cross any ordinary social boundary. Dr. Carrier had no other intimate communication with you, before or since.

In a bizarre and unnerving twist, you now claim to have been sexually harassed, sexually assaulted, and made victim to abuse. Not only are these claims baseless and false, but they undermine actual victims with legitimate claims.

Accordingly, we demand that you:

- (1) Immediately cease and desist your unlawful defamation of Dr. Carrier, and
- (2) Within ten days of the date of this correspondence provide us written assurances that you will cease and desist from further defamation of Dr. Carrier's character and reputation, and show proof of all published retractions as specified below, and
- (3) Publish a full written retraction, on Facebook and every other public forum wherein your defamatory statements were made, including, but not limited to, your false statements that:
  - a. Dr. Carrier sexually assaulted you, and that
  - b. Dr. Carrier sexually harassed you, and that
  - c. Dr. Carrier assaulted or harassed any other women.

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Once you have had an opportunity to review the contents of this letter, I urge you to consult with an attorney. Your attorney should certainly contact my office to discuss these issues, options, and courses of action. Should we not hear from you or receive your written assurances before the above noted deadline, I will have no choice but to advise my client as to all legal and equitable remedies that he may have available to him in regard to this matter, including, but not limited to, bringing a claim for defamation *per se* with a request for punitive damages.



CAMPBELL PERRY LLC

Please do not attempt to contact Dr. Carrier directly and refer all correspondences instead to my attention. I look forward to working with you in this matter.

Sincere Regards,

Jeffrey T. Perry, Esq.  
Campbell Perry, LLC  
Supreme Court No.: 0088989

cc: Dr. Richard Carrier

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